

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:19-CR-529-FL

UNITED STATES OF AMERICA

v.

CHRISTOPHER MARK WILSON

**GOVERNMENT'S MOTION
SEEKING ADDITIONAL 60
DAYS TO DETERMINE
RESTITUTION AMOUNT AND
RETURN OF PROPERTY**

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby notifies the Court that the parties are working together to finalize the victim's losses and to settle the return of certain property to the Defendant. The government, after speaking with the Defendant's counsel and the victim's counsel, respectfully requests additional time to negotiate the victim's restitution in this case and to comply the return of certain property.

The Defendant was sentenced before this Court on August 25, 2021. Both parties requested ninety (90) days to negotiate the issue of restitution and to comply with the Court's order regarding the return of the "M2 card" attached to one of the Defendant's computers or images stored on that device. Pursuant to 18 U.S.C. §§ 2259 and 3664, and in accordance with the terms and conditions of the Defendant's plea agreement, the Defendant must pay restitution as determined by the court.

The government has spoken with defense counsel and victim's counsel concerning restitution for "Lily" who is a victim in the Vicky series related to child pornography. Both defense counsel and victim's counsel have expressed several

reasons for the delay in finalizing a restitution amount for the judgment, including family medical issues. The government believes those issues are good cause for the delay.

The government will continue to work with all parties on restitution and the technical steps needed to comply with the return of the “M2 card” or the non-contraband images on the “M2 card.” Defense counsel has also indicated to the government that further negotiations on restitution and the return of the “M2 card” will most-likely resolve all issues without the need for an evidentiary hearing.

WHEREFORE, the United States respectfully requests that the Court hold restitution and the return of Defendant’s property in abeyance for 60 days for the parties the complete negotiations for restitution and technical steps for the return of the Defendant’s property.

Respectfully submitted this 2nd day of December, 2021.

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CERTIFICATE OF SERVICE

I certify that I have on this 2nd day of December, 2021, served a copy of the foregoing upon counsel for the defendant by CM/ECF as follows:

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